

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
---	----------------------------------

This document relates to: *All Actions*

**DECLARATION OF ROBERT T. HAEFELE TRANSMITTING EVIDENCE IN
SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' JOINT MOTION TO
EXCLUDE THE EXPERT TESTIMONY OF EVAN KOHLMANN AND MATTHEW
LEVITT [ECF NO. 9246], AND TO DEFENDANT YASSIN ABDULLAH KADI'S
MOTION TO EXCLUDE THE TESTIMONY OF VICTOR COMRAS [ECF NO. 9248]**

I, Robert T. Haeefe, pursuant to 28 U.S.C. §1746, declare, under penalty of perjury that, to the best of my knowledge, the following statements are true and correct:

1. I am an attorney admitted to practice in the above-captioned matter, a member of the Plaintiffs' Executive Committees in this MDL, and associated with the law firm Motley Rice LLC, counsel for plaintiffs in this MDL.
2. I submit this Declaration to identify the exhibits referenced in Plaintiffs' Opposition to Defendants' Joint Motion to Exclude the Expert Testimony of Evan Kohlmann and Matthew Levitt [ECF No. 9246], and to Defendant Yassin Abdullah Kadi's Motion to Exclude the Testimony of Victor Comras [ECF No. 9248].
3. Attached to this Declaration are true and correct copies of the following exhibits referenced in Plaintiffs' Memorandum of Law filed with this declaration.

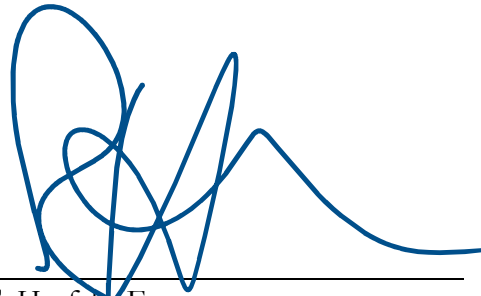
Ex. 1 (Kohlmann Rpt.)	Expert Report of Evan Francois Kohlmann (served Mar. 10, 2020)
Ex. 2 (Revisions to Kohlmann Rpt.)	Correspondence to Defense Counsel enclosing revised page 23 (¶ 71) and page 58 (n. 295) (Oct. 18, 2021)
Ex. 3 (Kohlmann Rebuttal Rpt.)	Rebuttal Report of Evan Francois Kohlmann (Feb. 2, 2021)

Ex. 4 (CV of Kohlmann)	Curriculum Vitae of Evan Francois Kohlmann
Ex. 4a (Kohlmann Kassir CV)	Curriculum Vitae of Evan Francois Kohlmann submitted in <i>United States v. Kassir</i> , 1:04-cr-00356-AT (S.D.N.Y. 2009), ECF No. 67.
Ex. 5 (Levitt Rpt.)	Expert Report of Dr. Matthew Levitt (Mar. 9, 2020)
Ex. 6 (Levitt Rebuttal Rpt.)	Expert Rebuttal Report of Dr. Matthew Levitt (Jan 18, 2021)
Ex. 7 (Levitt CV)	Curriculum Vitae of Dr. Matthew Levitt
Ex. 8 (Gurul� Rpt.)	Expert Opinion Report of Prof. Jimmy Gurul� (Feb. 1, 2021)
Ex. 9 (Comras Rpt.)	Expert Report of Victor D. Comras (Oct. 29, 2020)
Ex. 10 (Comras Rebuttal Rpt.)	Expert Rebuttal Report of Victor D. Comras Concerning Yasin Kadi and Wael Julaiden (Feb. 16, 2021)
Ex. 11 (Comras CV)	Curriculum Vitae of Victor Comras
Ex. 12 (Kohlmann Tr.)	Transcript of the Deposition of Evan Francois Kohlmann (Aug. 5, 6, 2021) – excerpted pages.
Ex. 13 (Levitt Tr.)	Transcript of the Deposition of Dr. Matthew Levitt (Apr. 7, 2021) – excerpted pages.
Ex. 14 (Comras Tr.)	Transcript of the Deposition of Victor D. Comras (July 23, 2021) – excerpted pages.
Ex. 15 (Al Harbi Tr.)	Transcript of the Deposition of Fahd Mohammad Sanad Alharbi (March 26, 2019) – excerpted pages
Ex. 16 (Ibrahim Abdullah Tr.)	Transcript of the Deposition of Ibrahim Abdullah (October 21, 2019) – excerpted pages.
Ex. 17 (Barron Tr.)	Transcript of the Deposition of John Barron (April 29, 2021) – excerpted pages.
Ex. 18 (Brown Tr.)	Transcript of the Deposition of Jacob Vahid Brown (May 25, 2021) – excerpted pages.
Ex. 19 (Kadi Tr.)	Transcript of the Deposition of Yassin Abdullah Kadi (July 10, 2018) – excerpted pages.
Ex. 20 (Hr'g Tr., June 26, 2023)	Transcript of June 26, 2023, Hearing in front of Magistrate Judge Netburn
Ex. 21 (PECs' Oct. 12, 2021 Ltr to Salerno)	Plaintiffs' Executive Committees' Letter to Yassin Kadi's counsel, Peter

	Salerno, regarding Victor Comras (Oct. 12, 2021).
Ex. 22	Excerpt of <i>Al-Qaida's Jihad in Europe: The Afghan-Bosnian Network</i> .
Ex. 23 (US v. Osmakac)	<i>USA v. Osmakac</i> , 8:12-CR-00045-MSS-AEP (M.D. Fl. 2012), ECF No. 270
Ex. 24 (Georgetown SFS website)	Archived Georgetown School of Foreign Service “Majors and Certificates” Website – Timestamped October 3, 2002.
Ex. 25 (FBI Surv. Log)	FBI Awlaki Surveillance Log, Dec. 18, 2001 (previously filed at ECF No. 3912-43)
Ex. 26 (Certificate Requirements)	Pamphlet of Certificate Requirements in Islam and Muslim-Christian Understanding from Georgetown’s School of Foreign Service.
Ex. 27 (Minor Requirements)	Minor Requirements in Islam and Muslim-Christian Understanding from Georgetown’s School of Foreign Service.
Ex. 28 (IANA Speakers)	Islamic Association of North America (IANA) W. Coast List of Speakers, 2000.
Ex. 29 (Marks Tr.)	Transcript of the Deposition of Jonathan Marks (July 22, 2021) – excerpted pages.
Ex. 30	Plaintiffs’ responsive catalog to Defendants’ catalog that was submitted as Exhibits 1 at ECF No. 9254-1 (and 9250-1).

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed in Mount Pleasant, South Carolina, on September 15, 2023


 /s/
 Robert T. Haefele, Esq.